



STATE OF SOUTH CAROLINA
DEPARTMENT OF EDUCATION

MOLLY M. SPEARMAN
STATE SUPERINTENDENT OF EDUCATION

July 16, 2019

Mrs. Elizabeth Robinson, Superintendent
York 4 School District
2233 Deerfield Drive
Fort Mill, SC 29715

Dear Mrs. Robinson:

As a participant in the National School Lunch Program and its related initiatives, every school food authority (i.e., school district, private school, charter school, or residential child care institution) is subject to periodic reviews to ensure compliance with state and federal requirements.

Attached is the summary report for the Administrative Review (AR) of your Child Nutrition Program (CNP). The findings of the review were discussed during an exit conference.

The South Carolina Department of Education (SCDE) is required to conduct an AR of every school food authority (SFA) at least once every three (3) years, pursuant to regulations and policy guidelines promulgated by the United States Department of Agriculture (USDA) (7-CFR-210.18 (c)), South Carolina Code of Laws (59-1-310 and 43-168), and the Program Agreement executed between an SFA and the SCDE.

The mission of the SCDE in conducting an AR is to showcase the quality and importance of local child nutrition programs; measure compliance with state and federal requirements; and identify opportunities for improvement. At the federal level, the AR process measures general program compliance with specific emphasis on:

- Free and Reduced Price Meal Benefits Certification;
- Meal Access and Reimbursement;
- Resource Management;
- Nutritional Integrity of Meals and All Other Foods Sold in Schools; and

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- Other Related Federal Programs.

In addition to an evaluation of key SFA administrative processes and records, onsite visitation(s) were/was made based on specific selection criteria.

We appreciate all of the assistance our staff received during the AR process. If you have any questions or concerns, please contact your lead reviewer.

Sincerely,



Ronald F. Jones
Director, Office of Health and Nutrition

RFJ/kw

Attachment

cc: Tammie Welch, Child Nutrition Program Director
Donna Davis, District Services Team Leader, SCDE Office of Health and Nutrition
Krystal Waldrop, Education Associate, SCDE Office of Health and Nutrition

York 4 School District

On Site Review Dates: April 2-5, 2019

<u>Director:</u> Tammie Welch	<u>Telephone:</u> (803) 548-3549 <u>Email:</u> welct@fortmillschools.org
<u>Lead Reviewer:</u> Krystal Waldrop	<u>Telephone:</u> (803) 734 - 8196 <u>Email:</u> kwalsrop@ed.sc.gov
<u>Review Month:</u> February 2019	<u>Review Week:</u>
<u>Pre Conference Date:</u> <u>Attendance:</u>	<u>Exit Conference Date:</u> April 5, 2019 <u>Attendance:</u>

Site Visited	Day of Review	Reviewer	Site Manager
Fort Mill Middle	April 4, 2019	Krystal Waldrop	Lisa Carlson
Nation Ford High	April 3, 2019	Krystal Waldrop	Judy McManus
Orchard Park Elementary	April 2, 2019	Krystal Waldrop	Jenn Koch



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Administrative Review Process

United States Department of Agriculture (USDA) Performance Standard 1

School Food Authority (SFA) Level

This section of the review evaluates the accuracy of free and reduced student eligibility records and their use in meal counting and claiming procedures.

Key Functional Areas Covered: Free and reduced eligibility applications (if applicable), direct certifications, income verifications, rosters, and meal counting and claiming procedures.

Actual Performance: Based on evaluation of eligibility records and meal counting and claiming procedures at the selected schools all success criteria were met.

Resource Management-SFA Level

This section evaluates whether the SFA used food service funds pursuant to USDA guidelines.

Key Functional Areas Covered: Maintenance of the nonprofit Child Nutrition Program (CNP) account, paid lunch equity, revenue from non-program foods, indirect costs, USDA Foods, and use of food service funds per federal and state guidelines.

Actual Performance: Based on evaluation of financial documentation, all success criteria were met.

General Program Compliance

This section evaluates whether the SFA followed general program compliance as indicated by USDA guidelines.

Key Functional Areas Covered: Civil rights, SFA onsite monitoring, Local School Wellness Policy and school meal environment, smart snacks, professional standards, water availability, Food Safety, storage, and Buy American, reporting and record keeping, food safety, School Breakfast and Summer Food Service Program outreach.

Actual Performance: Based on evaluation of documentation, all success criteria were met.

Commendations: SFA does an excellent job implementing BIC. 8% to 15% increase participation average across the board. Should be considered a Best Practice.

USDA Performance Standard 2

Meal Access and Reimbursement-School Level

This section evaluates whether the lunch menus for the review month and individual lunches served during the onsite visitation of reviewed schools meet minimum state and federal meal pattern requirements. In addition, breakfast service at Nation Ford High & Fort Mill Middle was evaluated during the onsite visitation.

Key Functional Areas Covered: Meal counting and claiming procedures.

Actual Performance: Based on evaluation of documentation and observations made during the onsite visitation, all success criteria were met.

Nutritional Quality and Meal Pattern-School Level

This section evaluates whether the lunch and breakfast (if applicable) menus for the review month and day of review at the reviewed schools met minimum state and federal meal pattern requirements.

Key Functional Areas Covered: Meal components and quantities, offer versus serve, dietary specifications and nutrient analysis and certifying a School Food Authority for performance-based reimbursement.

Actual Performance: Based on evaluation of documentation and observations made during the onsite visitation, all success criteria were met.

General Program Compliance-School level

This section evaluates whether the SFA followed general program compliance as indicated by USDA guidelines.

Key Functional Areas Covered: Civil rights, Local School Wellness Policy, Smart Snacks in School, water, reporting and record keeping, food safety, storage and buy American.

Actual Performance: Based on evaluation of documentation and observations made during the onsite visitation, all success criteria were met.

South Carolina Student Health and Fitness Act-School Level

This section evaluates local progress in implementing state-specific nutrition standards for reviewed schools serving a K-5 population.

Key Functional Areas Covered: Food and beverages sold on K-5 school property during the regular school day, as well as student input on cafeteria menu and related activities.

Actual Performance: Based on evaluation of documentation and observations made during the onsite visitation, all success criteria were met.

Other Federal Program Reviews

This section evaluates whether the SFA followed general program compliance as indicated by USDA guidelines.

Key Functional Areas Covered: Afterschool Snack service, Seamless Summer Option, and Fresh Fruit and Vegetable Program.

Actual Performance: Based on evaluation of documentation and observations made during the onsite visitation, all success criteria were met.

Closure

Based on this review, this letter serves to close the Administrative Review process. We appreciate all of the assistance our staff received during the reviews.

Technical Assistance (TA) for Administrative Review (AR)

SFA: York 4

Date of On-Site AR: April 2, 2019

Location SFA Office or Site (1)	Areas Requiring TA (2)	TA Received Supporting Documentation (3)	TA Provided by: Person Receiving TA: (4)
Fort Mill Middle School	USDA Performance Standard 2 School Food Authority: 400 – Meal Components & Quantities	<p>Increase efficiency line and lunch schedule to ensure students have enough time to eat lunch.</p> <p>TA was given to ensure students have adequate time to consume their breakfast and lunch meals. Lunch schedule and line efficiency needs to be a joint collaboration between the LEA and SFA.</p> <p>Schedules need to be reviewed and assess to ensure everyone is on the same page.</p> <p>There were many times there were no students dismissed from their tables to come to the service line.</p>	<p>Provided by: <u>Krystal Waldrop</u></p> <p>Received by: <u>Tammie, Director</u></p>
Fort Mill Middle School	General Program Compliance: 1400 Food Safety	<p>TA was given onsite to ensure all HACCP forms are completed throughout the SY in a timely manner per SFA policy.</p> <p>CFR 210.13 (c) (a) Health standards. The school food authority shall ensure that food storage, preparation and service is in accordance with the sanitation and health standards established under State and local law and regulations.</p> <p>(b) Food safety inspections. Schools shall obtain a minimum of two food safety inspections during each school year conducted by a State or local governmental agency responsible for food safety inspections. They shall post in a publicly visible location a report of the most recent inspection conducted, and provide a copy of the inspection report to a member of the public upon request. Sites participating in more than one child nutrition program shall only be required to obtain two food safety inspections per school year if the nutrition programs offered use the same facilities for the production and service of meals.</p> <p>(c) Food safety program. The school food authority must develop a written food safety program that covers any facility</p>	<p>Provided by: <u>Krystal Waldrop</u></p> <p>Received by: <u>Tammie, Director</u></p>

or part of a facility where food is stored, prepared, or served. The food safety program must meet the requirements in paragraph (c)(1) or paragraph (c)(2) of this section, and the requirements in §210.15(b)(5).

(1) A school food authority with a food safety program based on traditional hazard analysis and critical control point (HACCP) principles must:

- (i) Perform a hazard analysis;
- (ii) Decide on critical control points;
- (iii) Determine the critical limits;
- (iv) Establish procedures to monitor critical control points;
- (v) Establish corrective actions;
- (vi) Establish verification procedures; and
- (vii) Establish a recordkeeping system.

(2) A school food authority with a food safety program based on the process approach to HACCP must ensure that its program includes:

- (i) Standard operating procedures to provide a food safety foundation;
- (ii) Menu items grouped according to process categories;
- (iii) Critical control points and critical limits;
- (iv) Monitoring procedures;
- (v) Corrective action procedures;
- (vi) Recordkeeping procedures; and
- (vii) Periodic program review and revision.

(d) Storage. The school food authority shall ensure that the necessary facilities for storage, preparation and service of food are maintained. Facilities for the handling, storage, and distribution of purchased and donated foods shall be such as to properly safeguard against theft, spoilage and other loss.

Nation Ford High School	General Program Compliance: 1400 Food Safety	SFA needed to move the DHEC report from the service line to outside the kitchen to ensure it is posted for the public to see at all times. CFR 210.13 (c) (see above)	Provided by: Krystal Waldrop Received by: Tammie, Director
Orchard Park Elementary	General Program Compliance: 1400 Food Safety	TA was given onsite to ensure all HACCP forms are completed throughout the SY in a timely manner per SFA policy. CFR 210.13(c) (see above)	Provided by: Krystal Waldrop Received by: Tammie, Director
Orchard Park Elementary	General Program Compliance: 1400 Food Safety	TA was given onsite to ensure manager is aware of the Buy American Procedures are being implemented and followed. Grapes were found onsite from Chile, FSD had proper documentation to indicate the grapes were not available. CFR 210.21 (d) - (a) General. State agencies and school food authorities shall comply with the requirements of this part and 2 CFR part 200, subpart D and USDA implementing regulations 2 CFR part 400 and part 415, as applicable, which implement the applicable requirements, concerning the procurement of all goods and services with nonprofit school food service account funds. (d) Buy American—(1) Definition of domestic commodity or product. In this paragraph (d), the term ‘domestic commodity or product’ means— (i) An agricultural commodity that is produced in the United States; and (ii) A food product that is processed in the United States substantially using agricultural commodities that are produced in the United States.	Provided by: Krystal Waldrop Received by: Tammie, Director